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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
GOOGLE LLC'S ADMINISTRATIVE
MOTION TO SEAL PORTIONS OF
JOINT LETTER BRIEF IN RESPONSE
TO ORDER RE PRIVILEGE DISPUTE
(DKT. 487-1, DISPUTE P25)**

Referral: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is Google LLC’s Administrative Motion to Seal Portions of Joint Letter Brief in Response to Order re Privilege Dispute, Dkt. 487-1, Dispute P25 (“Motion”). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Documents Sought to Be Sealed	Court's Ruling on Motion to Seal	Party Claiming Confidentiality	Reason(s) for Court's Ruling
Joint Letter Brief	Portions Highlighted in Yellow at: Pages 1, 2, 3	Google	The information requested to be sealed contains Google's highly confidential and proprietary information, including details related to project names, internal identifiers, Google's internal practices with regard to Incognito and its proprietary functions, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

1 **SO ORDERED.**
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3 DATED: _____

4 _____
5 HON. SUSAN VAN KEULEN
6 United States Magistrate Judge
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